

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**Lee Compton,**  
**Plaintiff**

**v.**

**Celtic Insurance Company and John Does  
1-10.**  
**Defendants.**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**Civil Action No. 4:22-cv-00331-ALM**

**JOINT MOTION TO EXTEND THE MEDIATION DEADLINE**

Plaintiff Lee Compton (“Plaintiff”) and Defendant Celtic Insurance Company (“Celtic”), through their undersigned counsel, hereby respectfully move the Court to extend the deadline for the completion of mediation in the current scheduling order, Dkt. 21. In support of their joint motion, the parties state as follows:

1. On December 18, 2024, the Court entered a scheduling order and an order referring the case to mediation (the “Orders”). Dkts. 21 and 22.
2. The Orders set a deadline of February 25, 2025 for the parties to complete mediation. *Id.*
3. The parties have worked together and with the mediator but were unable to schedule the mediation until after the February 25, 2025 deadline.
4. The mediation is currently scheduled for March 6, 2025.
5. To allow the parties to prepare for and attend the mediation on March 6 without running afoul of the Court’s orders, the parties respectfully request that the mediation deadline be extended to March 7, 2025.

6. This extension is not requested for any improper purpose and will not cause any delay or prejudice any party.

WHEREFORE, the parties respectfully request that this Court grant this motion to extend the mediation deadline to March 7, 2025.

Dated: February 21, 2025

Respectfully submitted,

**HUSCH BLACKWELL LLP**

By: /s/ Matthew D. Knepper

Matthew D. Knepper, *pro hac vice*  
8001 Forsyth Boulevard, Suite 1500  
St. Louis, Missouri 63105  
314.480.1500 – Telephone  
314.480.1505 – Facsimile  
[Matt.knepper@huschblackwell.com](mailto:Matt.knepper@huschblackwell.com)

Timothy P. Ribelin, Lead Attorney  
State Bar No. 24091055  
111 Congress Avenue, Suite 1400  
Austin, Texas 78701  
(512) 479-1153 (direct telephone)  
(512) 226-7375 (facsimile)  
[Tim.Ribelin@huschblackwell.com](mailto:Tim.Ribelin@huschblackwell.com)

*Counsel for Defendant Celtic Insurance  
Company*

/s/ Jacob U. Ginsburg

Jacob U. Ginsburg, Esq.  
Kimmel & Silverman, P.C.  
30 East Butler Ave.  
Ambler, PA 19002  
Phone: 215-540-8888 ext. 104  
Facsimile: 877-788-2864  
Email: [jginsburg@creditlaw.com](mailto:jginsburg@creditlaw.com)  
[teamkimmel@creditlaw.com](mailto:teamkimmel@creditlaw.com)

*Counsel for Plaintiff Lee Compton*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 21st day of February, 2025, the foregoing was filed electronically with the Clerk of Court, to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Matthew D. Knepper

Matthew D. Knepper